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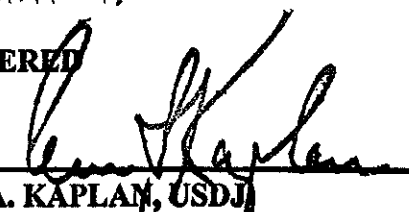t. 800.757.2304
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June 26, 2023

VIA ECF
Hon. Lewis A. Kaplan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 21B
New Yor, New York 10007-1312

Granted.

SO ORDERED

_____
LEWIS A. KAPLAN, USDJ
Dated: 6-27-2023

Re: **In re Customs and Tax Administration of the Kingdom of
Denmark (SKAT) Tax Refund Litigation
Master Docket No.: 1:18-md-02865-LAK-RWL[1]**

Dear Judge Kaplan:

My law firm represents individual Defendant, Gavin Crescenzo, and his associated pension plans in the below footnoted sixteen (16) individual actions within this MDL (collectively the "Crescenzo Defendants"). On today's date, my law firm will be filing a motion to withdraw as counsel for the Crescenzo Defendants in all of these actions. In support of this motion, we will be filing the Declaration of Joseph LoPiccolo, which contains sensitive recitations of communications between myself and Mr. Crescenzo that are protected from disclosure by the attorney-client privilege and/or attorney work-product doctrine.

Accordingly, I write to Your Honor at this time respectfully requesting the Court issue an Order permitting my law firm to file the Declaration of Joseph LoPiccolo under seal. "'[D]ocuments in support of motions to withdraw as counsel are routinely filed under seal

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[1] This letter applies to the following actions: 1:18-cv-05147, 1:18-cv-05150, 1:18-cv-05151, 1:18-cv-05158, 1:18-cv-05164, 1:18-cv-05180, 1:18-cv-05183, 1:18-cv-05185, 1:18-cv-05186, 1:18-cv-05188, 1:18-cv-05189, 1:18-cv-05190, 1:18-cv-05192, 1:18-cv-05193, 1:18-cv-05194 and 1:18-cv-05307.